

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THOMPSON PRODUCTS, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-11810-RGS
)	
GLENN THOMPSON, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**JOINT MOTION TO EXTEND THE TIME FOR DEFENDANTS TO OPPOSE
PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiff Thompson Products, Inc. ("TPI") and Defendants Glenn Thompson and Splash Creations, Inc. (f/k/a Thompson Enterprises, Inc.) jointly request an extension up to and including January 3, 2007, for the Defendants to file an opposition to TPI's Motion to Enforce Settlement Agreement (Doc. # 62).

As grounds for this motion, the parties state as follows:

1. The parties are working cooperatively toward resolving this matter and expect that they soon will be in a position to report the case as settled.
2. The parties believe that the requested extension is necessary to preserve the status quo in the interim.
3. The parties further request that, if they are unable to resolve this matter, the Court adjust the discovery schedule set forth in its July 12, 2006 Memorandum and Order on Motion for Summary Judgment on Count III of the Amended Complaint (Doc. # 61) as follows:
 - a. Fact discovery to be extended by 90 days from the Court's decision on TPI's Motion to Enforce Settlement Agreement (Doc. # 62);

- b. Dispositive motions to be filed by 120 days from the Court's decision on TPI's Motion to Enforce Settlement Agreement (Doc. # 62);
 - c. Responses to be filed no later than 150 days from the Court's decision on TPI's Motion to Enforce Settlement Agreement (Doc. # 62);
 - d. All other terms of discovery to be governed by the provisions of the Local Rules unless otherwise ordered by the Court.
4. All parties have agreed to the relief requested in this motion and no party will be prejudiced by the requested extension.

WHEREFORE, Plaintiff TPI and Defendants Glenn Thompson and Splash Creations, Inc, jointly request an extension up to and including January 3, 2007, for the Defendants to file an opposition to TPI's Motion to Enforce Settlement Agreement (Doc. # 62).

Respectfully submitted,

THOMPSON PRODUCTS, INC.

GLENN THOMPSON and SPLASH
CREATIONS, INC.

By its attorneys,

By their attorneys,

/s/ Andrew D. Kang

/s/ Matthew F. Medeiros

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DATED: December 1, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 1, 2006.

/s/ Lisa A. Tenerowicz

Lisa A. Tenerowicz

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Pursuant to Local Rule 7.1, I hereby certify that on or about December 1, 2006, I communicated with plaintiff's counsel, Sandy Tucker, in an effort to resolve or narrow the issues presented by this motion. Mr. Tucker stated that he and Andrew Kang would agree to the filing of a joint motion.

/s/ Lisa A. Tenerowicz

Lisa A. Tenerowicz

So Ordered:

Richard G. Stearns
United States District Judge
Entered: